

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRIMINAL NO. 22-342 (SCC)

[1] WANDA VAZQUEZ-GARCED,
[2] JULIO M. HERRERA-VELUTINI,
[3] MARK T. ROSSINI,

Defendants.

**JOINT INFORMATIVE MOTION AND
REQUEST FOR VIRTUAL HEARING**

TO THE HONORABLE COURT:

COMES NOW all defendants, through their undersigned attorneys, and respectfully state the following:

1. The parties hereby inform the Court that they have reached an agreement with the government. Under this agreement, the government will file a one-count Information. Accordingly, the parties respectfully request that the Court schedule a hearing at which the defendants may be arraigned and enter their pleas pursuant to this agreement.

2. Additionally, the parties request that the Court conduct the hearing virtually. Two of the defendants, Mr. Herrera and Mr. Rossini, currently reside outside the United States. Additionally, Mr. Herrera is unable to enter the United States at this time because his visa expired. A virtual hearing for all defendants will allow this matter to proceed without any delay and expeditiously. All counsel of record consent to this request. The government has no objection to proceeding virtually.

WHEREFORE, the parties respectfully request that the Court take notice of this agreement and schedule a hearing to be conducted virtually.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of June 2025.

DLA Piper (Puerto Rico) LLC

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CERTIFICATE OF SERVICE

It is hereby certified that on this date the present motion is filed with the Clerk of the Court through the CM/ECF electronic system which will notify and provide copies to all parties of record.

/s/ Sonia I. Torres-Pabón